

Exhibit E

Complaint

FILED

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SONYA KRASKI
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SNOHOMISH CO. WASH

18-2-08480-31
CMP 2
Complaint
3883410



IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SNOHOMISH

SHELLEY S. HAWKINS,

Plaintiff

v.

A&E FACTORY SERVICE,
L.L.C., a Delaware limited liability
company; SEARS HOLDINGS
MANAGEMENT CORPORATION,
a foreign profit corporation;
FATEMAH S. ALSUWAIDAN and
JOHN DOE ALSUWAIDAN,
husband and wife and their marital
community; EDWIN G. MIGUEL
and JANE DOE MIGUEL, husband
and wife and their marital
community; and JENNI M.
WAKIDA and JOHN DOE
WAKIDA, husband and wife and
their marital community,

Defendants

No **18 2 08480 31**
COMPLAINT FOR NEGLIGENCE

COMES NOW the Plaintiff, through counsel, for causes of action against the
Defendants, and alleges as follows:

I. JURISDICTION

1. This lawsuit arises out of multiple motor vehicle collisions. All events alleged
herein occurred within the limits of Snohomish County, Washington.

COMPLAINT FOR NEGLIGENCE - 1

Original

LAW OFFICES OF
TERENCE F. TRAVERSO, P.S.
1408 140th Place N.E., Suite 140
Bellevue, Washington 98007
Phone: (425) 453-0115/Fax: (425) 412-4060

1 II. PARTIES AND VENUE

2 2. The Plaintiff is a resident of Snohomish County, Washington.

3 3. Upon information and belief, Defendant Fatemah Alsuwaidan was a driver
4 licensed in the State of Washington at all times material hereto.

5 4. Upon information and belief, Defendants Fatemah Alsuwaidan and John Doe
6 Alsuwaidan, are believed to be husband and wife and reside, and at all times material hereto
7 have resided, in King County, Washington. The true name of John Doe Alsuwaidan is
8 unknown to the Plaintiff at this time. All acts and omissions alleged herein were on behalf of
9 said defendants' marital community.

10 5. Upon information and belief, Defendant Edwin G. Miguel was a driver licensed
11 in the State of Washington at all times material hereto.

12 6. Upon information and belief, Defendant Edwin G. Miguel resides, and at all
13 times material hereto has resided, in Snohomish County, Washington.

14 7. Upon information and belief, Defendant A&E Factory Service, L.L.C. is, and at
15 all times material hereto was, a Delaware corporation doing business in the State of
16 Washington as A&E Factory Service, L.L.C.

17 8. Upon information and belief, Defendant Sears Holdings Management LSE is,
18 and at all times material hereto was, a foreign profit corporation doing business in the State of
19 Washington as Sears Holdings Management Corporation.

20 9. Upon information and belief, Defendant Jenni M. Wakida was a driver licensed
21 in the State of Washington at all times material hereto.

22 10. Upon information and belief, Defendants Jenni M. Wakida and John Doe
23 Wakida, are believed to be husband and wife and reside, and at all times material hereto have
24 resided, in Snohomish County, Washington. The true name of John Doe Wakida is unknown
25 to the Plaintiff at this time. All acts and omissions alleged herein were on behalf of said
26 defendants' marital community.

1 11. Jurisdiction and venue are proper in this Court.

2 III. NOVEMBER 16, 2016, MOTOR VEHICLE COLLISION

3 12. On November 16, 2016, at the hour of approximately 3:15 p.m., Plaintiff
4 Shelley Hawkins was operating her vehicle in Lynnwood, Washington.

5 13. At or about this time, Defendant Fatemah Alsuwaidan was driving a vehicle
6 owned by and registered to PV Holding Corporation d/b/a/ Budget Rent A Car System, Inc.

7 14. At or about this time, Defendant Fatemah Alsuwaidan caused the vehicle she
8 was operating to crash into the vehicle operated by the Plaintiff.

9 15. Defendant Fatemah Alsuwaidan was negligent in operating her vehicle and her
10 negligence caused the incident described above.

11 16. At or about this time, Defendant Edwin Miguel was driving a vehicle owned by
12 and registered to Sears Holdings Management LSE.

13 17. At all times material hereto, Defendant Edwin Miguel was an employee of
14 Defendant A&E Factory Service, L.L.C. and/or Defendant Sears Holding Management LSE
15 and was operating the vehicle while acting within the scope of his employment and/or
16 authority for or on behalf of Defendant A&E Factory Service, L.L.C. and/or Defendant Sears
17 Holding Management LSE as their employee and/or agent.

18 18. After the above-described collision caused by Defendant Fatemah Alsuwaidan,
19 Defendant Edwin Miguel caused the vehicle he was operating to crash into the Defendant
20 Fatemah Alsuwaidan vehicle, causing Defendant Fatemah Alsuwaidan's vehicle to crash a
21 second time into the Plaintiff's vehicle.

22 19. Defendant Edwin Miguel and Defendant Fatemah Alsuwaidan were negligent
23 in operating their vehicles and their negligence caused the incident described in the foregoing
24 paragraph.

25 IV. JANUARY 6, 2017, MOTOR VEHICLE COLLISION

26 20. On January 6, 2017, at the hour of approximately 12:05 p.m., Plaintiff Shelley
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1 Hawkins was operating her vehicle in Everett, Washington.

2 21. At or about this time, Defendant Jenni Wakida was driving a vehicle owned by
3 and registered to herself.

4 22. At or about this time, Defendant Jenni Wakida caused her vehicle to crash into
5 the vehicle operated by the Plaintiff.

6 23. Defendant Jenni Wakida was negligent in operating her vehicle and her
7 negligence caused the incident described above.

8 V. CLAIMS OR CAUSES OF ACTION

9 24. As a result of all defendants' negligence, the Plaintiff was struck with such
10 force and violence as to cause serious injury. The Plaintiff's injuries have caused medical
11 expenses, pain and suffering, and other special and general damages.

12 25. One or more of the defendants attributes the cause of some or all of the
13 Plaintiff's alleged damages to other defendants herein.

14 VI. DEMAND FOR RELIEF

15 The Plaintiff requests that judgment be entered against the Defendants, jointly and
16 severally, as follows:

17 1. Awarding special damages for expenses, medical costs, and other losses in an
18 amount to be proven at the time of trial;

19 2. Awarding general damages for pain, suffering, loss of enjoyment of life and
20 other losses in an amount to be proven at the time of trial;

21 3. Awarding costs incurred in this action including reasonable attorney's fees; and

22 4. Awarding any further relief that this Court may deem just and proper.

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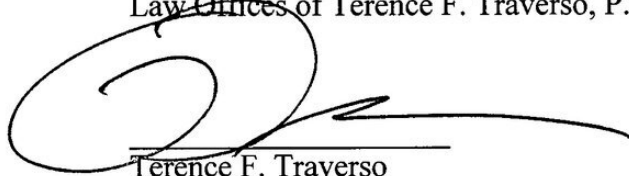
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28 COMPLAINT FOR NEGLIGENCE - 4

1 DATED this 18th day of September, 2018.

2 Law Offices of Terence F. Traverso, P.S., by

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4 Terence F. Traverso
5 WSBA #21178
6 Attorney for Plaintiff
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